

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF  
THE EXTRADITION OF  
MICHAEL L. TAYLOR

)  
)  
)  
)  
)  
)  
)  
)

Case No. 20-mj-1069-DLC

IN THE MATTER OF  
THE EXTRADITION OF  
PETER M. TAYLOR

Case No. 20-mj-1070-DLC

**JOINT STATUS REPORT AND PROPOSED BRIEFING SCHEDULE FOR  
EXTRADITION HEARING**

The parties in the above-captioned cases hereby file this Joint Status Report and Proposed Briefing Schedule for the Extradition Hearing of Michael and Peter Taylor. The parties respectfully request the Court set a date for the combined extradition hearing and order a briefing schedule as described below. In support of this request, the parties state as follows:

First, on June 29, 2020, Japan transmitted the formal requests for the extradition of Michael and Peter Taylor along with the supporting documentation to the United States Department of State (“State Department”), and the State Department forwarded the materials to the Department of Justice (“Government”). On July 4, 2020, the Government produced electronic versions of the extradition requests and supporting documentation to counsel for Michael and Peter Taylor.

Second, the parties have agreed that this Court should hold a single extradition hearing for both Michael and Peter Taylor, but acknowledge that each respondent is entitled to separate consideration under the relevant statute.

Third, the parties request that the Court hold the extradition hearing on August 28, 2020. If that date is not available, then the parties request the Court hold the extradition hearing on August 27, 2020. Given the proposed hearing dates, the parties have agreed to the following briefing schedules:

If the hearing is scheduled for August 28, 2020, the parties request the Court order the following briefing schedule:

- Government's Opening Brief: August 7, 2020
- Taylors' Opposition Brief: August 17, 2020
- Government's Reply Brief: August 26, 2020.

If the hearing is scheduled for August 27, 2020, the parties request the Court order the following briefing schedule:

- Government's Opening Brief: August 7, 2020
- Taylors' Opposition Brief: August 17, 2020
- Government's Reply Brief: August 25, 2020.

### **CONCLUSION**

The parties respectfully request the Court set a hearing date and briefing schedule for the Taylors' extradition hearing as described above.

Date: August 4, 2020

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

MICHAEL AND PETER TAYLOR  
By their attorneys,

By: /s/ Stephen W. Hassink  
STEPHEN W. HASSINK  
Assistant U.S. Attorney

/s/ Paul V. Kelly  
PAUL V. KELLY  
Counsel for Michael and Peter Taylor

/s/ Philip A. Mirrer-Singer  
PHILIP A. MIRRER-SINGER  
Trial Attorney

/s/ Abbe David Lowell  
ABBE DAVID LOWELL  
Counsel for Michael and Peter Taylor

/s/ Daniel Marino  
DANIEL MARINO  
Counsel for Michael Taylor

/s/ James P. Ulwick  
JAMES P. ULWICK  
Counsel for Peter Taylor

**CERTIFICATE OF SERVICE**

I, Stephen W. Hassink, Assistant U.S. Attorney, do hereby certify that on August 4, 2020, I served a copy of the foregoing on all registered parties by electronic filing on ECF.

/s/ Stephen W. Hassink  
Stephen W. Hassink  
Assistant U.S. Attorney